

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELLIOT MCGUCKEN,

Plaintiff,

-against-

SHUTTERSTOCK, INC.,

Defendant.

Case No. 1:22-cv-00905 (GHW)

ORAL ARGUMENT REQUESTED

**DEFENDANT'S NOTICE OF MOTION TO EXCLUDE EXPERT TESTIMONY AND
REPORT OF THOMAS MADDREY, ESQ.**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Eleanor M. Lackman dated January 20, 2023 and supporting exhibits, and all prior pleadings and proceedings herein, defendant Shutterstock, Inc., through its undersigned counsel, will move this Court, at the United States District Court for the Southern District of New York located at 500 Pearl Street, New York, New York 10007, before the Honorable Gregory H. Woods, on a date and time to be scheduled by the Court, for an Order excluding the report and testimony of plaintiff Elliot McGucken's proffered expert witness, Thomas Maddrey, Esq. and for such other further relief as the Court may deem just and proper.

Respectfully submitted,

Dated: New York, New York
January 20, 2023

MITCHELL SILBERBERG & KNUPP LLP

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